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ABBOTT LABORATORIES

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

SMITHKLINE BEECHEM CORPORATION,)
d/b/a GLAXOSMITHKLINE,)
Plaintiff,)
vs.)
ABBOTT LABORATORIES,)
Defendant.)

Case No. C 07-5702 CW
Related per November 19, 2007 Order to
Case No. C-04-1511 CW
DECLARATION OF NICOLE M. NORRIS
IN SUPPORT OF ABBOTT
LABORATORIES' MISCELLANEOUS
ADMINISTRATIVE MOTION TO FILE
CERTAIN DOCUMENTS UNDER SEAL
Date: February 21, 2008
Time: 2:00 p.m.
Courtroom: 2 (4th Floor)
Judge: Hon. Claudia Wilken

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San Francisco, CA 94111-5894

1 I, NICOLE M. NORRIS, declare:

2 1. I am an attorney at law, admitted to practice in this Court for this matter. I
3 am an associate with the law firm of Winston & Strawn LLP, counsel of record for Abbott
4 Laboratories ("Abbott"), and am authorized to make this Declaration in that capacity.

5 2. I submit this Declaration under Local Rule 79-5(d) in support of the sealing of
6 Exhibit A to the Declaration of Nicole M. Norris in support of Abbott's Motion to Transfer pursuant
7 to 28 U.S.C. § 1404(a) that has been designated "highly confidential" by Plaintiff, Smith Kline
8 Beechem d/b/a GlaxoSmithKline ("GSK").

9 3. GSK produced this document as a third party in *SEIU, et al v. Abbott*
10 *Laboratories*, Case No. 04-1511, pending before this Court. When GSK produced this document, it
11 produced it under the existing protective order in that case as highly confidential.

12 4. Thus, in order to preserve the confidentiality asserted by GSK, Abbott seeks
13 to file Exhibit A to the Declaration of Nicole Norris in support of Abbott's Motion to Transfer under
14 seal.

15 I declare under penalty of perjury under the laws of the United States of America that
16 the foregoing is true and correct.

17 Executed in San Francisco, this 11th day of December, 2007.

18
19 /s/ Nicole M. Norris

20 _____
Nicole M. Norris